

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

JACQUELINE D. MARSTELLER)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 1:13cv593
)	(JCC/JFA)
ECS FEDERAL, INC.)	
f/k/a ELECTRONIC CONSULTING)	
SERVICES, INC.,)	
)	
Defendant.)	

**MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE
TO FILE AMENDED COMPLAINT**

Plaintiff, JACQUELINE D. MARSTELLER, by counsel, has moved this Court, pursuant to Fed.R.Civ.P. 15, for leave to file an Amended Complaint.

ARGUMENT

1. This is Ms. Marsteller's first request for leave to amend her Complaint.
2. Any and all amendments arise out of the same conduct, transactions and occurrences that were the subject of the original pleading.
3. The Amended Complaint clarifies and amplifies certain factual allegations made in the Complaint and asserts new claims.
4. The Amended Complaint also adds new Defendants as a result of the amplification of the factual allegations and assertions of new claims.
5. In addition, Plaintiff has removed reference to the monetary amounts referenced in ¶¶ 42 and 46 of the original Complaint from the corresponding paragraphs

of the Amended Complaint, and asks that those amounts be redacted from the original Complaint in deference to confidentiality concerns.

6. Defendant ECS has not been served in this case, and would suffer no prejudice as a result of the amendment.

7. The Amended Complaint is attached hereto as Attachment 1.

CONCLUSION

Plaintiff's Motion for Leave to file an Amended Complaint should be granted.

May 29, 2013

Respectfully submitted,

/S/ CARLA D. BROWN

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